

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

MEMPHIS A. PHILLIP RANDOLPH INSTITUTE, et. al.,)	
)	
Plaintiffs,)	
)	
v.)	No. 3:20-cv-00374
)	
TRE HARGETT, et. al.,)	
)	
Defendants.)	

AFFIDAVIT OF DONNA BURGNER

STATE OF TENNESSEE
COUNTY OF GREENE

The affiant, Donna Burgner, does hereby appear and after first being duly sworn according to law makes oath as follows:

1. My name is Donna Burgner. I am the Administrator of the Greene County Election Commission. I have held this position at all times relevant. I am over the age of eighteen and am competent to testify. I have personal knowledge of the matters contained in this affidavit.

2. (a) Upon information and belief, Peggy McCamey, the individual named on the subpoena and Chairperson of the Greene County Election Commission, suffered a traumatic medical event in the previous months.

2. (b) The subpoena was served on Peggy McCamey as the Chairperson of the Greene County Election Commission on November 13, 2020

3. The subpoena contained a production deadline of November 25, 2020.

4. The subpoena was received while the Greene County Election Commission was in the process of certifying the Federal Election of November 3, 2020.

EXHIBIT A

5. Based on my experience and time as Administrator of the Greene County Election Commission and in reviewing the requests of the subpoena, attempting to comply with the requirements of the subpoena would significantly interfere with the certification timeline of the Federal Election of November 3, 2020 and the other duties required of my office.

6. Based on my experience and time as Administrator of the Greene County Election Commission and in reviewing the requests of the subpoena, I estimate that making a good faith effort to comply with these requests would take approximately sixty (60) days from the date of the signing of this affidavit.

7. Based on my experience and time as Administrator of the Greene County Election Commission and in reviewing the requests of the subpoena, the Greene County Election Commission would need to utilize its entire staff and a significant portion of its financial resources to comply with the demands.

8. It is my belief that a significant portion of these documents are in the possession of one or more of the named Defendants.

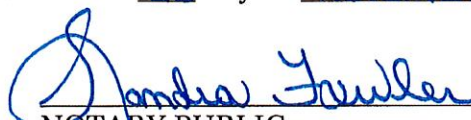
9. Based on my experience and time as Administrator of the Greene County Election Commission and in reviewing the requests of the subpoena, I was unable to discern the exact documents requested in the subpoena and believed a search of all documents held by the Greene County Election Commission would be necessary in order to comply with the demands.


DONNA BURGNER

STATE OF TENNESSEE)
)
COUNTY OF GREENE)

Sworn to and subscribed before me this 23 day of November, 2020.




NOTARY PUBLIC
My Commission Expires: 8-28-2021